



VIA OVERNIGHT DELIVERY

September 15, 2009

Sharon Abendschan, Enforcement Specialist
Technical Enforcement Program
8ENF-RC
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, CO 80202

Re: Response to Request for Information Pursuant to Section 104 of CERCLA regarding
Insurance Coverage for Mining Companies Related to the Gilt Edge Mine Site, Lawrence
County, South Dakota ("Site")

Dear Ms. Abendschan:

This response is provided to the U.S. Environmental Protection Agency's letter requesting information from The Hartford Financial Services Group, Inc., ("The Hartford") pursuant to Section 104(e) of CERCLA regarding insurance coverage for the entities identified in Enclosure 1 of the EPA's letter of July 17, 2009. By agreement reached with Ms. Madigan, EPA Enforcement Attorney, The Hartford received an extension of time to respond to the request through September 30, 2009.

While we recognize that The Hartford is not a responsible "person" within the meaning of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") with regard to the Site, we wish to cooperate with the EPA's efforts relative to the Site and are voluntarily providing this response to assist the EPA's efforts to the extent possible without compromising any business privilege or confidentiality rights afforded to The Hartford by applicable law. The Hartford is providing the EPA with copies of responsive insurance policies and related documents in its possession. The Hartford acknowledges that it is possible that some potentially relevant documents have not yet been identified, located, and/or reviewed. In this regard, we reserve the right to supplement or amend this response in the event additional information is identified that may be responsive to this request.

Following your request, we have performed a reasonable investigation and attempted to locate and copy the responsive documents, which are contained on the enclosed CD. However, because of the requirements of Section 104(e), we believe we are also required to preserve objections and

protect legal rights by submitting those objections in writing. Accordingly, given the accompanying production of documents, we also provide the following individual responses for the record. The Hartford does not intend by these responses to waive any applicable protection or right it has or may have in responding to these requests, including but not limited to the specific objections set forth below. In addition, the information and documents produced in response to this Information Request are submitted as "Company Confidential" and "Proprietary Business Information" pursuant to all applicable statutes and regulations.

As a general matter, The Hartford objects to the general scope of the Information Request. As noted specifically below (but not by way of limitation), The Hartford objects to the extent that the Information Request is overly broad, unduly burdensome, contains indefinite requests, seeks information not reasonably relevant to the above-referenced Site, and exceeds the EPA's statutory authority. Further, The Hartford objects to providing any information or documents protected by the attorney/client or work-product privileges. The Hartford reserves all of its rights, defenses and other legal protections afforded by applicable laws.

Additionally, The Hartford objects to the instructions and definitions included within the Information Request to the extent they purport to amend, change, or in any way modify or expand the scope of the controlling statutes pursuant to which this Information Request is issued. Further, The Hartford objects to the use of certain terms that are vague and not defined or which appear to add requirements that would not be applicable in other situations, such as discovery in court, and The Hartford does not adopt those definitions. The Hartford's response is in accordance with the generally accepted meanings of the terms utilized in framing the questions, without expansion or vagueness potentially created by the stated Definitions.

The Hartford incorporates by reference the objections and reservations of its rights stated above in its responses below. Without waiving its objections, The Hartford provides the following information:

Response to No. 1

After conducting a reasonable search, The Hartford identified insurance policies and related documents responsive to the request and is providing copies of these policies and documents, as identified below. Without waiving its general objections, The Hartford otherwise objects to this request as vague, overly broad, ambiguous and burdensome. The Hartford acknowledges that it is possible that some potentially relevant documents have not yet been identified, located, and/or reviewed. In this regard, we reserve the right to supplement or amend this response in the event additional information is identified that may be responsive to this request. The Hartford is providing the following insurance policies and related documents (including, but not limited to, broker/agent correspondence, premium computation, and reinsurance related information):

Name	Policy No.	Policy Period
Lacana Mining Inc.	53HU820853	02/16/79-03/27/80
Lacana Mining Inc.	53SMP109030	03/27/79-03/27/80

Lacana Mining Inc.	53HU840979	03/27/80-03/27/81
Lacana Mining Inc.	53SMP110216	03/27/80-03/27/81
Lacana Mining Inc.	53RHUBH6832	03/27/81-03/27/82
Lacana Mining Inc.	53SMPCF7025	03/27/81-03/27/82
Lacana Mining Inc.	53RHUBH6832	03/27/82-03/27/83
Lacana Mining Inc.	53SMPCF7025	03/27/82-03/27/83
Lacana Mining Inc.	53RHUBH6832	03/27/83-03/27/84
Lacana Mining Inc.	53SMPCF7025	03/27/83-03/27/84
Lacana Mining Inc.	53RHUVM1934	03/27/84-03/27/85
Lacana Gold Inc.	53UUCKC7525	03/27/84-03/27/85
Lacana Mining Inc.	53UECKC8114	05/15/84-05/15/85
Lacana Mining Inc.	53RHUVM1934	03/27/85-03/27/86
Lacana Gold Inc.	53UUCKC7525	03/27/85-03/27/86
Lacana Mining Inc.	53UECKC8114	05/15/85-05/15/86
Lacana Gold Inc.	53RHUVM1934	03/27/86-03/27/87
Lacana Gold Ind.	53UENKC1726	03/27/86-03/27/87
Lacana Gold Inc.	53RHUVM1934	03/27/87-03/27/88
Lacana Gold Inc.	53UENKC1726	03/27/87-03/27/88
Lacana Gold Inc.	53RHUVM1934	03/27/88-03/27/89

Response to No. 2

After conducting a reasonable search, The Hartford found no document or information that was responsive to this request. The Hartford otherwise objects to this request as vague, ambiguous, over broad and burdensome.

Response to Nos. 3 - 5

Without waiving its general objections, The Hartford objects to these requests as vague, ambiguous, overbroad and burdensome. The Hartford is producing policy and related documents (including broker/agent correspondence, premium computation records and reinsurance related information.) Please refer to Response 1. The Hartford acknowledges that it is possible that some potentially relevant documents have not yet been identified, located, and/or reviewed. In this regard, we reserve the right to supplement or amend this response in the event additional information is identified that may be responsive to this request.

Response to Nos. 6 - 7

After conducting a reasonable search, The Hartford found no document or information that was responsive to this request. The Hartford otherwise objects to this request as vague, ambiguous, overbroad and burdensome.

Response to No. 8

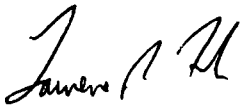
Without waiving its general objections, The Hartford objects to these requests as vague, overbroad and burdensome. Without waiving its objections, please refer to Response No. 1, as well as the document provided by the U.S. EPA in its enclosure to its letter of July 17, 2009.

The Hartford consulted its records (including archived files) in its possession in the preparation of the answers to these information requests, which records are located at its main office at One Hartford Plaza, Hartford, Connecticut 06155, and its file archives storage facility located in Bloomfield, Connecticut. The primary contacts for this information are Lawrence Farber, Assistant Vice President, Complex Claim Group, The Hartford, One Hartford Plaza T-6-93, Hartford, Connecticut 06155, telephone number (860) 547-7337, Michael Petropoulos, Counsel, Complex Claim Group Legal, The Hartford, One Hartford Plaza T-6-93, Hartford, Connecticut 06155, telephone number (860) 547-5450, and Jonathan Drakos, Account Representative, Complex Claim Group, who can be contacted through Mr. Petropoulos.

All of the responses set forth above are based upon The Hartford's reasonable investigation of its documents, and its current information, understanding and belief. The Hartford reserves its right to conduct additional investigation with reference to any and all documents, facts, and evidence discovered after the date of these responses, notwithstanding the absence of the reference herein to such documents, facts or evidence at this time, and to supplement, amend or modify these responses as may be appropriate.

Please contact Michael Petropoulos if you have any questions about this response or if you should require any further information, and thank you again for the courtesy of the extension.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence Farber", with a stylized flourish at the end.

Lawrence Farber
Assistant Vice President
Complex Claim Group

CD Enclosed

LF:smh

TARGET SHEET
EPA REGION VIII
SUPERFUND DOCUMENT MANAGEMENT SYSTEM

DOCUMENT NUMBER: _____

SITE NAME: _____

DOCUMENT DATE: _____

DOCUMENT NOT SCANNED

Due to one of the following reasons:

- ☐ PHOTOGRAPHS
- ☐ 3-DIMENSIONAL
- ☐ OVERSIZED
- ☐ AUDIO/VISUAL
- ☐ PERMANENTLY BOUND DOCUMENTS
- ☐ POOR LEGIBILITY
- ☐ OTHER
- ☐ NOT AVAILABLE
- ☐ TYPES OF DOCUMENTS NOT TO BE SCANNED
(Data Packages, Data Validation, Sampling Data, CBI, Chain of Custody)

DOCUMENT DESCRIPTION:
